

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

In re:	:	
	:	
AIROCARE, INC.,	:	Case No. 10-14519-RGM
	:	(Chapter 11)
Debtor.	:	
	:	
:	:	
	:	
AIROCARE, INC.,	:	
	:	
Plaintiff	:	Adversary Proceeding
	:	No. 10-01481-RGM
v.	:	
	:	
WILLIAM R. CHAMBERS, et al.	:	
	:	
Defendants.	:	
	:	
:	:	:
:	:	:
:	:	:
:	:	:
:	:	:

**PROUTY, RUTCHIK AND WOODBRIDGE**  
**RULE 26(a)(2) EXPERT DISCLOSURES**

COMES NOW Defendants Jack Prouty (“Prouty”), Stuart Rutchik (“Rutchik”) and Terrance Woodbridge (“Woodbridge”), by and through their attorneys Craig M. Palik, James M. Greenan and McNamee Hosea Jernigan Kim Greenan & Lynch, P.A. and Roy L. Mason, Robert H. B. Cawood, and Mason & Cawood, P.A., pursuant to the Scheduling Order entered by the Court on February 14, 2011, hereby provides expert witness disclosures under Fed.R.Civ.P. 26(a)(2) as follows:

Dennis Kelly  
5805 Bowie Mill Ct  
Olney, MD 20832  
301-926-1921

Mr. Kelly is a hybrid fact/expert witness. Mr. Kelly is expected to testify factually regarding the formation and operation of the AirOcare Irrevocable Life Insurance Trust.

Mr. Kelly is an expert in Trusts, including but not limited to Irrevocable Life Insurance Trust (“ILIT”) and the AirOcare ILIT. Mr. Kelly is expected to offer expert opinion(s) and testify factually regarding ILITs in general and the AirOcare ILIT. Mr. Kelly is expected to testify that the AirOcare ILIT was properly formed, was a valid entity. Mr. Kelly is expected to testify about the premise behind the AirOcare ILIT, the structure and operation of ILITs in general and the structure and operation of the AirOcare ILIT, and the validity of any loans made from the AirOcare ILIT, the funding of ILITs in general the AirOcare ILIT and may offer testimony in rebuttal to AirOcare’s experts, if any.

Jack Prouty  
309 Dawnwood Drive  
Edgewater, MD 31037

Jack Prouty was a Vice-President of AirOcare until February, 2009, and a co-founder of AirOcare. Mr. Prouty is a shareholder of record of the Debtor. At AirOcare, Mr. Prouty’s roles and responsibilities focused on sales for AirOcare necessary to sustain the growth and scalability of AirOcare. Mr. Prouty is a hybrid fact/expert witness. Mr. Prouty is expected to offer expert opinion(s) and testify factually regarding the transactions and facts as stated in AirOcare’s Complaint, the formation, management and operation of AirOcare, the financial sustainability and prognosis of AirOcare, the technical aspects of AirOcare’s products, and the validity of the AirOcare Irrevocable Life Insurance Trust (“ILIT”) and may offer testimony in rebuttal to AirOcare’s experts, if any.

Stuart Rutchik  
723 Galestone Street  
Gaithersburg, MD 20878

Stuart Rutchik was Vice-President of Finance and Administration of AirOcare until February, 2009. Mr. Rutchik is a shareholder of record of the Debtor. At AirOcare, Mr. Rutchik’s roles and responsibilities focused on managing the administrative and corporate functions necessary to sustain the growth and scalability of AirOcare. Mr. Rutchik is expected to offer expert opinion(s) and testify factually regarding the transactions and facts as stated in AirOcare’s Complaint, the formation, management and operation of AirOcare, the financial sustainability and prognosis of AirOcare, the technical aspects of AirOcare’s products, and the validity of the AirOcare Irrevocable Life Insurance Trust (“ILIT”) and may offer testimony in rebuttal to AirOcare’s experts, if any.

Terrance Woodbridge  
107 Parkcanyon Lane  
Cary, NC 27519

Terrance Woodbridge was Vice-President of Technical Development of AirOcare until November, 2009, and a co-founder of AirOcare. While at AirOcare, Mr. Woodbridge was responsible for the design, manufacturing, testing and installation of all AirOcare products, was responsible for new product development as well as supervision of field operations and technical support. Mr. Woodbridge developed, evolved, and continued product innovation and expansion of AirOcare's proprietary break-through technologies, and holds several key patents. Mr. Woodbridge is expected to offer expert opinion(s) and testify factually regarding the transactions and facts as stated in AirOcare's Complaint, the formation, management, and operation of AirOcare, the financial sustainability and prognosis of AirOcare, the technical aspects of AirOcare's products, and the validity of the AirOcare Irrevocable Life Insurance Trust ("ILIT"), the development and ownership of the patents, and may offer testimony in rebuttal to AirOcare's experts, if any.

Date: April 14, 2011

MCNAMEE HOSEA, ET AL

/s/ Craig M. Palik

Craig M. Palik, Esquire (VSB  
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MASON & CAWOOD, P.A.

/s/ Roy L. Mason

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Attorneys for Jack Prouty, Stu  
Rutchik and Terry Woodbridge

**CERTIFICATE OF SERVICE**

I hereby certify that on this April 14, 2011 a true copy of the foregoing was electronically served on all parties and counsel of record in this matter using electronic mail (where electronic mail address is available) and sent by first-class mail postage pre-paid to the following parties:

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**Robert Mazie**

as Trustee of the AirOcare Benefit Trust  
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/s/ Craig M. Palik

**Craig M. Palik**